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DICKINSON, WRIGHT, MOON, VAN DUSEN & FREEMAN

COUNSELLORS AT LAW

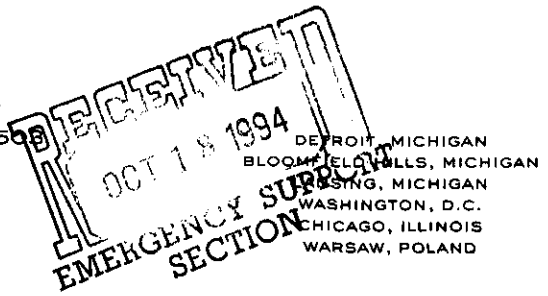
SUITE 900

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GRAND RAPIDS, MICHIGAN 49503

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DUSTIN P. ORDWAY
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October 14, 1994

This is a confirmation copy of a document
previously transmitted Via Facsimile.

VIA FACSIMILE & MAIL

Ms. Linda Beasley
Enforcement Specialist
U.S. EPA - Region V (HSE-5J)
Emergency Support Section
77 W. Jackson Blvd.
Chicago, IL 60604

Ms. Cynthia N. Kawakami
U.S. EPA - Office of Regional
Counsel (CS-29A)
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Conservation Chemical Company of Illinois, Inc. Site,
Gary, Indiana. General Notice of Potential Liability

Dear Ms. Beasley and Ms. Kawakami:

We submit this response to the referenced General Notice Letter dated September 28, 1994, on behalf of Peerless Chain Company ("Peerless").

Please direct any future communications regarding Peerless to me at the above address and telephone number.

Peerless intends to cooperate with the EPA with regard to the Conservation Chemical Company Site ("CCC" Site) if Peerless is properly identified as a PRP. However, at this point, Peerless objects to the determination by EPA that it should be considered a PRP at the Site. Peerless is reviewing its records, but thus far has been unable to confirm that it engaged in any activity which would subject it to liability as a PRP at the CCC Site. Peerless will continue to review its records, but at this point does not believe that it should be considered a PRP for this Site. Until such time as we have had a full opportunity to examine all documentation relating to this Site, Peerless reserves its right to supplement its response to your General Notice letter. Peerless requests that EPA provide it with copies of all documentation upon which it based its conclusion that Peerless is a PRP for the Site.

Peerless is not familiar with the remedial activities conducted at the CCC Site, and has no basis for addressing whether EPA's alleged past costs were incurred properly or whether EPA's plan for further work at the Site is appropriate. Peerless objects to EPA's

Ms. Linda Beasley
Ms. Cynthia Kawakami
October 14, 1994
Page 2

premature demand for reimbursement of past costs since it has not had an opportunity to evaluate work done at the Site. Peerless requests that you provide copies of all supporting documentation necessary to establish that costs incurred were appropriate and consistent with the NCP, and that the costs pertain solely to oversight of remedial activities at the Site.

Until Peerless has an opportunity to evaluate the records allegedly showing its involvement at this Site and records relating to EPA's past costs and planned further remedial activities, it cannot agree to perform or finance any of these planned activities or reimburse EPA for its past costs.

I look forward to reviewing the information regarding Peerless and the CCC Site. A representative of Peerless will attend the meeting in Chicago on November 10, 1994. Peerless intends to continue to cooperate with the EPA in addressing its alleged liability with regard to this Site.

Please do not hesitate to contact me if you have any questions or comments regarding this response.

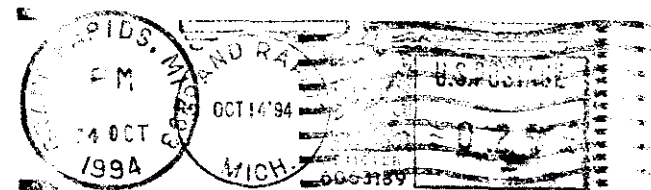
Very truly yours,

A handwritten signature in dark ink, appearing to read "Dustin P. Ordway", with a stylized flourish at the end.

Dustin P. Ordway

DPO/slm

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